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June 17, 2011

Ms. Susan M. Hudson, Clerk of the Board  
Vermont Public Service Board  
112 State Street, Drawer 20  
Montpelier, Vermont 05601-2701

Re: BED DRP EEU Rate and Bill Impact Analysis Comments

Dear Ms. Hudson:

As part of the Public Service Board's Energy Efficiency Utility Demand Resource Plan process, the Burlington Electric Department (BED) wishes to submit the following comments regarding the Department of Public Service's May 17, 2011 EEU Recommended Budgets and Rate and Bill Impact Analysis for BED.

BED is in general agreement with the DPS's BED EEU program budget recommendations. However, BED has been working with the DPS on possible revisions to BED's Rate and Bill Impact Analysis as some factors were used in the calculations that may not appropriately reflect BED's system. These factors include: the retail rate escalator, average energy line loss, summer and winter peak line losses and residential annual kWh usage. The original calculation used the statewide residential annual kWh usage figure which is higher than BED's average use.

BED is also mindful that the 2009 AESC Study on avoided costs is in the process of being updated and are expected to materially decline.

BED understands that some further revision to the DPS's budget recommendation and Rate and Bill Impact Analysis may be required and BED looks forward to working with the DPS on revisions as needed.

Please feel free to contact me with any questions.

Sincerely,

BURLINGTON ELECTRIC DEPARTMENT

A handwritten signature in blue ink, appearing to read "Chris Burns", is written over the typed name.

Chris Burns  
Director of Energy Services



**Energy Efficiency**  
A Way of Life

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